

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Charles P. Simon	:	Chapter 13
Patricia M. Simon	:	Case No. 19-17669-AMC
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY M&T BANK

Debtor, Charles & Patricia Simon, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by M&T Bank. hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted that payments were missed. Debtor made one lump sum payment and expects to be able to make another shortly into the new year. Debtor respectfully requests an updated accounting for the chance to cure in total or to modify the Chapter 13 plan.
7. Debtor unsure of the same.
8. Denied. Debtor asks for the chance to catch up.
9. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: December 27, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Denise Carlon, Esq.
Attorney for Movant *M&T Bank*.
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: December 27, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor(s)